

From: "Wade V. Welshons" <WelshonsW@missouri.edu>
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To: "Shelby, Michael (NIH/NIEHS) [E]" <shelby@niehs.nih.gov>
Conversation: CERHR interim draft report - comment
Subject: CERHR interim draft report - comment

June 20, 2007

Dr. Michael D. Shelby
CERHR Director
National Institute of Environmental Health Sciences
PO Box 12233 - MD EC-32
79 T.W. Alexander Dr. - Bldg. 4401
Research Triangle Park, NC 27709
email: shelby@niehs.nih.gov

Dear Dr. Shelby:

I am responding to the public comment period for the interim draft expert panel report on bisphenol A; I examined the April, 2007 version. There are two general aspects which to me represent the antithesis of valid science.

First is the overall format to have peer-reviewed publications in the field of actions of bisphenol A (BPA) re-reviewed by non-experts, non-peers, in BPA action, who have neither the expertise and experience of the journal reviewers, nor the replies to reviewer critiques which are not published but which were used to determine suitability for publication. I have been one of the reviewers for several of the papers showing effects of BPA which have re-reviewed as inadequate, and can tell you as an original reviewer that the re-reviews in the draft report make fundamental errors due to ignorance, and would never have been accepted by the editors. The process inverts and reverses peer-review, which a foundation of modern science.

Second is the acceptance of negative data where there are no positive controls, and the acceptance of negative data where the positive control has actually, demonstrably failed. In endocrine research this work would be unpublishable, and since BPA has been known as an estrogenic, endocrine active compound for over 70 years, there is no scientific reason for accepting data that are not controlled. Just as positive findings of effects require rigorous negative controls, the negative findings absolutely require valid positive controls, to show that the experimental system can measure anything at all. The acceptance of negative data without a valid positive control as "adequate for the evaluation process", at this point in modern science, is beyond my comprehension, other than as an indicator of the failure of the anti-peer-review process used by the CERHR.

Wade V. Welshons
Assoc. Prof.

Dept. of Biomedical Sciences
E102 Veterinary Medicine
University of Missouri-Columbia
Columbia, MO 65211-5120

Phone: (573) 882-3347

FAX: (573) 884-7186

Email: WelshonsW@missouri.edu